

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**JUUL LABS, INC.,**

**Plaintiff,**

**v.**

**THE UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE A,**

**Defendants.**

**Civil Action No. 1:19-cv-00715-LO-IDD**

**PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT JUDGMENT**

Plaintiff Juul Labs, Inc. (“Plaintiff” or “JLI”) by counsel and pursuant to Fed. R. Civ. P. 55(b), hereby moves for entry of default judgment against certain named defendants. For the reasons set forth in Plaintiff’s accompanying Memorandum, Plaintiff respectfully requests that this Court enter a default judgment against the following Defendants as numbered in Schedule A:<sup>1</sup>

| <b>No.</b> | <b>Defendant Name</b> | <b>Seller ID/ Defendant Store</b> | <b>Defendant Email</b>   |
|------------|-----------------------|-----------------------------------|--|
| 2          | Greg Hillhouse        | ghilly001                         | doubleh911@hotmail.com   |
| 3          | Panteley Nikolov      | pant-20                           | pantelein@gmail.com  |
| 4          | 敏 张 (Min Zhang)       | qiaotianping-zhengmeixinxi        | qtp_misszhang@outlook.com<br>shiyan0227@outlook.com<br>qtp_misszhang@hotmail.com |
| 5          |                       | miss_zhang                        |  |

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<sup>1</sup> Plaintiff is only seeking the entry of default against Defendants with whom Plaintiff has not reached a settlement. Plaintiff has reached a satisfactory settlement with the other named Defendants.

| No. | Defendant Name        | Seller ID/ Defendant Store | Defendant Email   |
|-----|-----------------------|----------------------------|---|
| 7   | Wenjiang Mai          | vapingpit                  | maiwenjiang@hotmail.com<br>misszhanglink2mwj@outlook.com<br>qtplink2mwj@outlook.com |
| 8   | 东东 王(Dong Dong Wang)  | savings4u168               | wangpaul668@gmail.com   |
| 10  | Mark Derias           | lulucaty5171               | markd@adventresources.com<br>marksafwat@hotmail.com                                 |
| 38  |                       | 2015.filta                 | mderias@scottrobinson.com<br>marksafwat@yahoo.com                                   |
| 12  | Antonio Cressotti     | a.cressotti69              | a.Cressotti88@gmail.com   |
| 15  | 莲翠 蒋 (Lian Cui Jiang) | kytech2016_0               | kytech2016@163.com  |
| 16  | 小华 汪 (Xiao Hua Wang)  | szeminhhangy               | wangxiaohua588@outlook.com  |
| 17  | Roy Walker            | sodal-87                   | sodalohapo@gmail.com  |
| 18  | Yervand Setoyan       | yervansetoya               | yervandsetoyan@icloud.com   |
| 20  |                       | yervansetoya-0             |   |
| 21  | Antonio Cressotti     | cress.anton                | xxweasel102xx@gmail.com   |
| 22  | 小华 汪 (Xiao Hua Wang)  | tyijiafkju                 | xiaohuawang588@outlook.com  |
| 23  | Eman Ghaly            | zbest4less2012             | sawaf75@yahoo.com   |
| 24  | 海艳 项 (Hai Yan Xiang)  | red-cherry2018             | cherry-xiang@outlook.com  |
| 25  | Jordan Horst          | jdonymous                  | jordanhorst29@gmail.com   |
| 26  | Myron Doyle           | myrodoyl0                  | pipelinerintexas@gmail.com  |
| 27  | Benz Tran             | betr-2                     | deezdeezllc@gmail.com   |
| 30  | Duy Tran              | ageless911                 | versace1910@yahoo.com   |
| 31  | Angelene Quimbaya     | quimstores_914             | angquimbaya27@gmail.com   |
| 33  | 鹏 林 (Peng Lin)        | talfangkoyu                | penglin188@outlook.com  |
| 34  | Ivan Zambarov         | ivanbgatlanta              | zambarovivan@gmail.com  |
| 36  | Nikolay Zanbarov      | nikobg1973                 | zmbrv@yahoo.com   |
| 39  | Mervat Aboulayla      | jafra1571                  | jamesfranco12h@gmail.com  |
| 40  | Noah Martano          | noamartan_0                | noahlasalle33@gmail.com   |
| 42  | Josif Leitner         | golit_34                   | yossileit@gmail.com   |
| 43  | Harlen Nappi          | harna_1763                 | harlennappi@gmail.com   |
| 51  | Christy Vasquez       | joose-6877                 | cvasquez727@hotmail.com   |
| 53  | 辉棋 林 (Hui Qi Lin)     | wanyancai559               | linhq888@hotmail.com  |
| 54  | Wenbo Lei             | wenwen996_4                | wenwen996@aliyun.com  |
| 55  | Marcio Diaz           | lostandfoundnyc            | liljuulpod@outlook.com<br>MarcioADiaz@outlook.com<br>misterjuul1@gmail.com          |

| No. | Defendant Name       | Seller ID/ Defendant Store | Defendant Email   |
|-----|----------------------|----------------------------|---|
| 59  | Nidal Hamayel        | nidahamaye-0               | nidal20095111@gmail.com   |
| 60  | Imad Rihan           | emadors15                  | emadors@yahoo.com   |
| 63  | Frederick Roesel     | hfbnvt_76                  | hfbnvtvjj7824@gmail.com   |
| 68  | 小华 汪 (Xiao Hua Wang) | yanshifu482                | wxhua188@outlook.com  |
| 70  | Dario Vasquez        | vasmi                      | Vasmi72@gmail.com   |
| 72  | Jordan Mcleod        | bigapplewares              | kirby8456@gmail.com   |
| 74  | Kyle Patterson       | richpattersonkyle          | cheapviralmoney@gmail.com<br>kylepatt02@gmail.com<br>wholesalejuulvendor@gmail.com<br>cassandrainlove1985@yahoo.com<br>kmakincash@aim.com<br>Sandrainlove1985@yahoo.com |

Plaintiff moves for statutory damages pursuant to 15 U.S.C. § 1117 (c)(2) in the amount of \$2,000,000 for each mark infringed, or \$4,000,000 per Subject Defendant, who each infringed Plaintiff's federally registered design mark in combination with at least one of Plaintiff's word marks, by their sale of the Counterfeit Juul Pods. Plaintiff also moves for entry of a permanent injunction against the Defendants from making, using, selling, or offering for sale any products that infringe Plaintiff's trademarks. Plaintiff also moves for this Court to order PayPal, Inc. to transfer any monies currently restrained in the above Defendants' financial accounts to be released to Plaintiff as partial payment of the above-identified damages.

Date: December 16, 2019

Respectfully submitted,

/s/ Monica Riva Talley

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Byron Pickard (VSB No. 47286)

Dennies Varughese, Pharm.D. (*pro hac vice*)

Nirav N. Desai (VSB. No. 72887)

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